

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: MAJOR R. RAINNEY

Debtor(s).

BKCY NO. 25-20872-GLT

Chapter 13

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that, pursuant to Rule 9010 of the Bankruptcy Rules, WILKINSBURG SCHOOL DISTRICT AND WILKINSBURG BOROUGH are creditors and hereby appear in this case.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 2002 of the Bankruptcy Rules, the undersigned requests that all notices and papers specified by the Rule, and all other notices given or required to be given in this case and all other papers served or required to be served in this case, be given to and served upon:

Jennifer L. Cerce, Esquire  
Lawrence J. Maiello, Esquire  
Maiello, Brungo & Maiello, LLP – Tax Division  
100 Purity Road, Ste. 3  
Pittsburgh, PA 15235  
Telephone: (412) 242-4400  
Facsimile: (412) 727-1667

The foregoing request includes without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering of reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery telephone, telegraph, telex or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in the case with respect to the (a) debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim an interest, or (c) property or proceeds

thereof in the possession, custody or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment, or other conduct.

PLEASE TAKE FURTHER NOTICE that WILKINSBURG SCHOOL DISTRICT AND WILKINSBURG BOROUGH intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (1) their right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; or (2) any other rights, claims, actions, defenses, setoffs, or recoupments to which they may be entitled to under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses setoff, and recoupments are expressly reserved.

MAIELLO, BRUNGO & MAIELLO, LLP

Dated: April 14, 2025

/s/ Jennifer L. Cerce

Jennifer L. Cerce, Esquire  
Pa. I.D. No. 81157  
424 S. 27<sup>th</sup> Street, Ste. 210  
Pittsburgh, PA 15203  
(412) 242-4400  
Attorney for Creditors

IN THE UNITED STATE BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: MAJOR R. RAINES

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**DECLARATION IN LIEU OF AFFIDAVIT**

I certify that this request supersedes any prior request for Notice by these creditors, that there is no other request to receive Notices for the specified creditors, and that I am authorized to make this request for Notices on behalf of the named creditors.

MAIELLO, BRUNGO & MAIELLO, LLP

Dated: April 14, 2025

/s/ Jennifer L. Cerce

Jennifer L. Cerce, Esquire  
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Pittsburgh, PA 15203  
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Attorneys for Creditors

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: MAJOR R. RAINY

Debtor(s). : BKCY NO. 25-20872-GLT  
: Chapter 13

CERTIFICATE OF MAILING OF NOTICE OR OTHER  
DOCUMENT TO PARTIES IN INTEREST

Major R. Rainey  
419 Grove Street, Apt. 3  
Pittsburgh, PA 15219

Albert G. Reese, Jr., Esquire  
Law Office of Albert G. Reese, Jr.  
640 Rodi Road, 2<sup>nd</sup> Floor, Suite 2  
Pittsburgh, PA 15235

Ronda J. Winnecur, Esquire  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

Office of the United States Trustee  
Suite 970, Liberty Center  
1001 Liberty Avenue  
Pittsburgh, PA 15222

MAIELLO, BRUNGO & MAIELLO, LLP

Dated: April 14, 2025

/s/ Jennifer L. Cerce

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Pittsburgh, PA 15203  
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Attorney for Creditors